



**GENOVA
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August 4, 2015

VIA ECF

Honorable Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007
Courtroom: 1506

Re: Martinez v. Skanska USA Inc. and Skanska USA Civil Northeast Inc.
Case No. 15-cv-4618

Dear Judge Abrams:

This firm represents Defendants Skanska USA Inc. and Skanska USA Civil Northeast Inc. ("Defendants") in the above-referenced matter. We write to respectfully request an extension of time for Defendants to answer or otherwise respond to Plaintiff's Complaint until August 18, 2015. The original due date for the Answer was on July 6, 2015. No previous request for an adjournment or extension of time has been requested or granted. Counsel for Plaintiff's counsel, Ronnie L. Silverberg, Esq., has consented to Defendants' request for an extension of time to answer or otherwise respond to the Complaint.

Thank you for Your Honor's time and kind consideration in this matter.

Respectfully Submitted,

GENOVA BURNS LLC

HARRIS S. FREIER

HSF:JAO

c: Hon. Sarah Netburn, U.S.M.J. (via ECF)
Ronnie L. Silverberg, Esq. (via ECF)
Walker G. Harman, Jr., Esq. (via Overnight Mail)